

**HEARING DATE AND TIME: April 8, 2015 @ 10:00 am (Eastern Time)**  
**OBJECTION DEADLINE: March 30, 2015 @ 4:00 pm (Eastern Time)**

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-and-

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*Counsel For Occidental Energy Marketing Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	Case No. 08-13555 (SCC)
Debtor.	

**JOINDER OF OCCIDENTAL ENERGY MARKETING INC. TO OBJECTIONS TO  
THE MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE  
QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

Occidental Energy Marketing, Inc. (“OEMI”), by and through its undersigned counsel, hereby joins in the Objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd. (the “Citadel Objection”) [D.I. # 49030] and the Objection of National Australia Bank Limited (the “NAB Objection”) [D.I. # 49029] filed in response to the Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the “Motion”) as follows:

**OBJECTION AND JOINDER**

1. OEMI and the Debtors were parties to certain derivative contracts. OEMI is listed on the Debtors' Exhibit A to the Motion and upon information and belief, the Debtors intend to disclose OEMI's confidential information to third-parties. OEMI hereby joins and incorporates by reference the arguments, in their entirety, made through the Citadel Objection and the NAB Objection to the Motion.

WHEREFORE, for the foregoing reasons, OEMI respectfully requests that this Court deny the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, direct the Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, as well as grant such other and further relief as this Court deems just and proper.

Dated: New York, New York  
March 30, 2015

**McCARTER & ENGLISH, LLP**

*Counsel For Occidental Energy Marketing Inc.*

*/s/ David J. Adler* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I, David J. Adler, do hereby certify that on March 30, 2015, I caused a true and correct copy of the electronically filed Objection and Joinder to all parties by operation of the Court's electronic filing system and served upon those parties requesting service by and through the Court's EM/ECF system.

*/s/ David J. Adler*  
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David J. Adler, Esquire